

**Deficiency Status Report 5**  
Status Report Submitted: July 20, 2007

**CUPA Name:** Tuolumne County Environmental Health  
**Evaluation Date:** March 22 and 23, 2006  
**Next Status Report Due:** July 23, 2007

**State Evaluation Team:**

**Cal/EPA Team Leader:** *Kareem Taylor*  
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Based on the CUPA's corrective action responses, the following deficiencies are considered corrected and no further updates are required: 1, 2, 6, 7, 8, 9, 12, 14, 15, 16, 17, 19, 20.

The following deficiencies are still in progress and an update of the progress should be provided on this status report.

**Deficiencies and Corrective Actions**

3. **Deficiency:** The CUPA is not inspecting HMRRP facilities once every three years.

**Preliminary Corrective Actions:** Inspect HMRRP facilities once every three years.

**CUPA's 5<sup>th</sup> Status Update:** The CUPA has inspected 62 HMRRP facilities this year. (see attached SWEEPS report)

4. **Deficiency:** The CUPA is not inspecting Hazardous Waste Generators once every three years.

**Preliminary Corrective Actions:** Inspect Hazardous Waste Generators once every three years.

**CUPA's 5<sup>th</sup> Status Update:** The CUPA has inspected 49 hazardous waste generators this year (see attached SWEEPS report)

5. **Deficiency:** The CUPA is not inspecting Underground Storage Tank facilities once a year.

**Preliminary Corrective Actions:** Inspect Underground Storage Tank facilities once every year.

**CUPA's 5<sup>th</sup> Status Update:** The CUPA inspected 11 UST sites this year. (see attached SWEEPS report) The environmental health division is experiencing severe personnel shortages and currently there is no available ICC certified inspector on staff. Two staff were sent for testing and both failed the examination. Additional testing is being scheduled.

10. **Deficiency:** The CUPA has not inspected all (both) CalARP facilities within the past three years.

**Preliminary Corrective Actions:** Inspect all CalARP facilities once every three years.

**CUPA's 5<sup>th</sup> Status Update:** The CUPA has failed to inspect the CalARP facilities for this year. The CUPA does not have anyone on staff trained to do CalARP inspections. Staff has attended one training with its neighboring county, Stanislaus for CalARP training and has planned to do additional training of inspections for completing the CalARP inspections this year.

- 11. Deficiency:** The CUPA is not obtaining inventories or inventory certification annually from all businesses subject to the Business Plan Program.

**Preliminary Corrective Actions:** Ensure that the next inventory submission is complete and correct.

**CUPA's 5<sup>th</sup> Status Update:** The CUPA has obtained inventories or inventory certification from 145 businesses this year. (see attachments)

- 13. Deficiency:** The CUPA is not ensuring that Business Plans are being reviewed every three years.

**Preliminary Corrective Actions:** Ensure that any business plan more than three years old has a certification of review or that a new business plan is submitted.

**CUPA's 5<sup>th</sup> Status Update:** The CUPA is ensuring that Business Plans are being reviewed by requesting certification statement reviews from all businesses and by reviewing plans during the routine inspection of businesses. (see attachments)

- 18. Deficiency:** While the former UST permit and conditions contained the required elements, the current UST permit and conditions does not contain all of the required elements.

**Preliminary Corrective Actions:** Develop a new UST permit and conditions containing the required elements as outlined in Title 23, Section 2712.

**Note:** The water board has stated that the CUPA may attach a monitoring plan to the permit to operate for UST facilities to correct this deficiency. All of the monitoring elements (included on the monitoring plan) must be included with the permit to operate.

**CUPA's 5<sup>th</sup> Status Update:** The CUPA has developed a new UST permit as outlined in Title 23, Section 2712. (see attachments)